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FILED
HARRISBURG
APR 20 2001
MARY E. D'ANDREA, CLERK
Per DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOAN D. TESCHÉ, :
 : Civil Action No. 1:CV-01-0326
Plaintiff :
v. :
 :
CNA INSURANCE COMPANIES, and :
CONTINENTAL CASUALTY COMPANY, :
 : JURY TRIAL DEMANDED
Defendants :

**UNCONTESTED MOTION FOR ENLARGEMENT
OF TIME TO FILE AMENDED COMPLAINT**

1. Plaintiff filed a complaint seeking payment of long-term disability insurance benefits under a state-law cause of action for breach of contract or, in the alternative, under an ERISA employee welfare benefit plan.

2. Defendants filed a 12(b)(6) motion which, inter alia, sought to dismiss plaintiff's state-law cause of action and to strike plaintiff's request for a jury trial.

3. Plaintiff's counsel, Bradford Dorrance, has agreed to file an amended complaint which should resolve most, if not all, of the issues raised by defendants' motion under Fed. R.C.P. No. 12(b)(6).

4. Plaintiff requests an enlargement of time of approximately 10 days in which to file an amended complaint in that:

(a) plaintiff's counsel need additional time to prepare the amended complaint; and

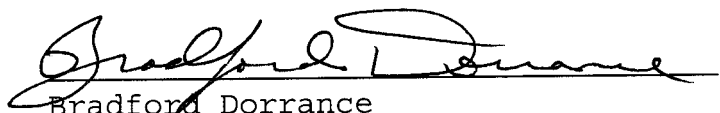
(b) defendant's counsel, Michael J. Burns, has no objection to the requested relief, as confirmed in the attached certificate of concurrence.

WHEREFORE, plaintiff requests that the Court enter the order accompanying this motion and grant such other relief as may be appropriate.

Respectfully submitted,

KEEFER WOOD ALLEN & RAHAL, LLP

Dated: 4/20/01



Bradford Dorrance

I. D. No. 32147

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P. O. Box 11963

Harrisburg, PA 17108-1963

(717) 255-8014

(Attorneys for Plaintiff)

CERTIFICATE OF CONCURRENCE

I, Bradford Dorrance, counsel for plaintiff, hereby certify that on April 19, 2001, I spoke with the secretary of Michael J. Burns, counsel for defendants, concerning the relief requested in the foregoing motion, and Mr. Burns indicated that he concurs in such motion.

Dated: 4/20/01


Bradford Dorrance

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the person(s) and in the manner indicated below:

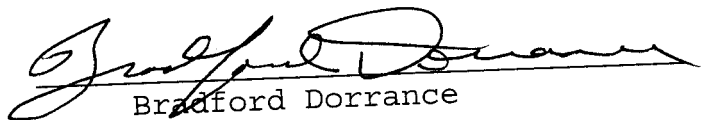
First-Class Mail, Postage Prepaid
Addressed as Follows:

Michael J. Burns, Esquire
CHRISTIE PARABUE MORTENSEN YOUNG
1880 JFK Boulevard
10th Floor
Philadelphia, PA 17103-7424

(Attorneys for Defendants)

Dated:

4/20/01


Bradford Dorrance